

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA, *ex rel.*
ALEX DOE, Relator, THE STATE OF
TEXAS, *ex rel.* ALEX DOE, Relator, THE
STATE OF LOUISIANA, *ex rel.* ALEX DOE,
Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD FEDERATION
OF AMERICA, INC., PLANNED
PARENTHOOD GULF COAST, INC.,
PLANNED PARENTHOOD OF GREATER
TEXAS, INC., PLANNED PARENTHOOD
SOUTH TEXAS, INC., PLANNED
PARENTHOOD CAMERON COUNTY,
INC., PLANNED PARENTHOOD SAN
ANTONIO, INC.,

Defendants.

2:21-CV-00022-Z

UNOPPOSED MOTION TO WITHDRAW COUNSEL

Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc. (together, “Affiliate Defendants”) file this Unopposed Motion to Withdraw Counsel, Jayce L. Born, in the above-styled and numbered case, and respectfully show as follows:

1. Affiliate Defendants are represented by Ryan Patrick Brown and Arnold & Porter Kaye Scholer LLP, including Christopher M. Odell from Arnold & Porter Kaye Scholer LLP as Defendants’ lead counsel;
2. Ms. Born was previously counsel for Affiliate Defendants in the above-captioned case;

3. Ms. Born is no longer employed by Arnold & Porter Kaye Scholer LLP;
4. Undersigned counsel will remain counsel of record for Affiliate Defendants; and
5. Plaintiffs and Defendant Planned Parenthood Federation of America, Inc. are unopposed to this Motion.

For the foregoing reasons, Affiliate Defendants respectfully request that the Court note the withdrawal of Jayce Born as counsel of record in the above-styled and numbered case.

Dated: June 7, 2024

Respectfully Submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

/s/ Tirzah S. Lollar

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Inc., Planned Parenthood Cameron County, Inc.,
and Planned Parenthood San Antonio, Inc.*

CERTIFICATE OF CONFERENCE

On June 6-7, 2024, I conferred with counsel for the State of Texas who indicated that the State of Texas is unopposed to this motion. I also conferred with counsel for Relator who indicated that Relator is unopposed to this motion. I also conferred with counsel for Planned Parenthood Federation of America who indicated Planned Parenthood Federation of America is unopposed to this motion.

/s/ Tirzah S. Lollar

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all participating counsel of record.

/s/ Tirzah S. Lollar